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18 **UNITED STATES DISTRICT COURT**
19 **CENTRAL DISTRICT OF CALIFORNIA**
20 **EASTERN DIVISION**

21 IN RE DDI CORP. SECURITIES
22 LITIGATION

23) No. CV-03-7063-SGL (SHx)

24)
25) **NOTICE OF MOTION AND**
26) **MOTION FOR DISTRIBUTION**
27) **OF NET SETTLEMENT FUND;**
28) **MEMORANDUM OF POINTS**
AND AUTHORITIES IN
SUPPORT OF MOTION

) Date: June 16, 2008

) Time: 10:00 AM

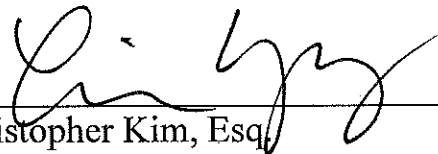
) Courtroom: 1, Riverside

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on June 16, 2008, at 10:00 AM in Courtroom 1
3 of the United States District Court for the Central District of California, Eastern
4 Division, located at 3470 Twelfth Street in Riverside, California, Lead Plaintiffs
5 Paul Poppe and LeRoy Schneider, and Representative Plaintiff Robert Watson
6 (together, the "Plaintiffs") will, and hereby does, bring a Motion to Distribute the
7 Net Settlement Fund. The Motion will be based on this Notice of Motion and
8 Motion, the Declaration of Andrew L. Zivitz, and the Declaration of Ellen E. Riley,
9 as well as all exhibits to the declarations and argument to be presented at the hearing
10 on this Motion. Pursuant to Local Rule 7-3, the counsel for Plaintiffs have met and
11 conferred with counsel for Defendants prior to filing this Motion.

12
13 Dated: May 16, 2008

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27 *the Settlement Class*
28

MEMORANDUM OF POINTS AND AUTHORITIES

Lead Plaintiffs Paul Poppe and LeRoy Schneider and Representative Plaintiff Robert Watson (together, the "Plaintiffs"), through their counsel, bring this motion to distribute the Net Settlement Fund and aver as follows:

1. By its Final Order and Judgment dated March 30, 2007, the Court approved the proposed Settlement and Plan of Allocation as fair, reasonable and adequate and in the best interests of the Settlement Class.

2. In accordance with the Notice of Pendency and Proposed Settlement of Class Action (the "Notice"), all Settlement Class Members wishing to participate in the Net Settlement Fund were required to complete a Court-approved Proof of Claim and Release form ("Proof of Claim") and to mail the Proof of Claim to the post office box identified in the Notice, which was maintained by The Garden City Group, Inc. ("GCG"), the claims administrator for the Settlement.

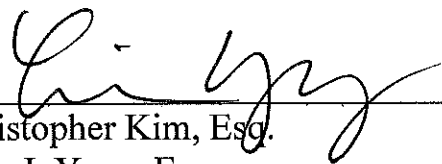
3. GCG administered the Settlement, and performed all analyses and accounting procedures in connection with the claims filed, and believes itself to be ready to effectuate distribution of the Net Settlement Fund.

Thus, based on the concurrently-filed Declaration of Ellen E. Riley of GCG, the Declaration of Andrew L. Zivitz of Schiffrin Barroway Topaz & Kessler, LLP, Lead Counsel for Plaintiffs and the Settlement Class, and upon all prior proceedings herein, Plaintiffs request that this Court issue an Order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (i) approving the administrative determinations of GCG accepting and rejecting claims submitted herein; (ii) directing distribution of the Net Settlement Fund, after deduction of the payment requested herein, to Settlement Class Members whose Proofs of Claim have been accepted; (iii) approving the plan for re-distribution and/or donation of any funds remaining in the Net Settlement Fund following the distribution to Settlement Class Members; (iv) authorizing destruction of paper copies of Proofs of Claim and all supporting

1 documentation one year after distribution of the Net Settlement Fund, and
2 authorizing destruction of electronic copies of claim records three years after
3 distribution of the Net Settlement Fund; and (v) for such other and further relief as
4 this Court deems appropriate. For the Court's convenience, a proposed Order
5 Authorizing Distribution of Net Settlement Fund is submitted concurrently with this
6 Motion.

7
8 Dated: May 16, 2008

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